

As requested by the document in question, I am writing to address the proposed applicability of these requirements to aircraft operated under 14 CFR 91.

The proposed requirement would not benefit 14 CFR 91 aircraft. First of all, the cost involved to change to a new transponder and/or to modify an existing electrical circuit to preclude any intentional disruption of the transponder code after it is entered would be cost prohibitive. Using a Cessna 152 for an example, a new transponder and the cost of labor to modify the airplane as requested would equal or exceed half the value of the airplane.

No benefit would result as of this change since most if not all pilots of part 91 airplanes know their passengers and do not pose a threat to anyone.

The historic data should indicate the number of times a 14 CFR 91 aircraft has been hijacked and used as a weapon, precluding any need for such a system.